

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BRANDON RAWLS,

Plaintiff,

v.

Case No. _____

TRANS UNION, LLC,

Defendant.

DEFENDANT TRANS UNION LLC'S NOTICE OF REMOVAL

COMES NOW, Trans Union LLC (“Trans Union”), by and through its counsel of record, and hereby files this Notice of Removal, pursuant to 28 U.S.C. § 1446(a) and, in support thereof, would respectfully show the Court as follows:

A. PROCEDURAL BACKGROUND

1. On or about August 2, 2024, Plaintiff Brandon Rawls (“Plaintiff”) filed his Complaint (“Complaint”) in this action in the Magistrate Court of Gwinnett County, Georgia, Case No. 24-M-32850 (“State Court Action”). In his Complaint, Plaintiff alleges violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681, *et seq.*

2. Trans Union was served with Plaintiff’s Complaint on August 5, 2024. This Notice of Removal is being filed within the 30-day time period required by 28 U.S.C. § 1446(b).

3. The time period for filing a responsive pleading in the State Court Action has not expired as of the filing of this Notice of Removal. No orders have been entered in the State Court Action as of the filing of this Notice of Removal.

B. GROUNDS FOR REMOVAL

4. The present suit is an action over which the United States District Court for the Northern District of Georgia, Atlanta Division, has original jurisdiction pursuant to 28 U.S.C. § 1331 as it is a civil action founded on a claim or right arising under the laws of the United States. This civil action may be removed to this Court by Trans Union pursuant to the provisions of 28 U.S.C. § 1446(b). Removal is proper because Plaintiff's claims present a federal question. 28 U.S.C. §§ 1331 and 1441(a). In the Complaint, Plaintiff seeks damages for Trans Union's alleged violations of the FCRA.

C. COMPLIANCE WITH PROCEDURAL REQUIREMENTS

5. Pursuant to 28 U.S.C. § 1441(a), venue of the removal action is proper in the United States District Court for the Northern District of Georgia, Atlanta Division, because it is in the district and division embracing the place where the State Court Action is pending.

6. Promptly after the filing of this Notice of Removal, Trans Union shall give written notice of removal to the Plaintiff and will file a copy of this Notice of

Removal with the Magistrate Court of Gwinnett County, Georgia, as required by 28 U.S.C. § 1446(d).

7. Pursuant to 28 U.S.C. § 1446(a), copies of all process, pleadings, and orders served upon Trans Union in the State Court Action are attached hereto as

Exhibit A.

8. Trial has not commenced in the Magistrate Court of Gwinnett County, Georgia.

WHEREFORE, Trans Union respectfully prays that this action be removed to this Court and that this Court assume full jurisdiction as if it had been originally filed here.

Respectfully submitted,

/s/ Paul W. Sheldon

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Counsel for Trans Union LLC

LOCAL RULE 5.1 CERTIFICATION

I hereby certify that TRANS UNION LLC'S NOTICE OF REMOVAL has been prepared in Times New Roman 14-point font in accordance with Local Rule 5.1.

/s/ Paul W. Sheldon

PAUL W. SHELDON

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of September 2024, I filed the foregoing with the Clerk of the Court using the Court's E-Filing system. I further certify that I have mailed the above and foregoing document by Electronic Mail and United States Postal Service to the following:

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Pro Se Plaintiff

/s/ Paul W. Sheldon

PAUL W. SHELDON

EXHIBIT A

State Court Pleadings